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ORIGINAL

October 29, 1999

Ms. Blanca S. Bayo, Director  
Division of Records and Reporting  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399-0850

RECORDS AND REPORTING

53 OCT 29 PM 4:38

RECEIVED-FPSC

Re: Docket Nos. 981834-TP & 990321-TP; Motion to Accept  
Testimony One Day Out of Time and Certificate of Service.

Dear Ms. Bayo:

Enclosed for filing is the original and seven (7) copies of Sprint-Florida, Incorporated's Motion to Accept Testimony One Day Out of Time. Also, included is Certificate of Service for the testimony of Sprint witnesses Hunsucker and Cloz.

Please acknowledge receipt and filing of the above by stamping the duplicate copy of this letter and returning the same to this writer.

Sincerely,

Charles J. Rehwinkel

- AFA \_\_\_\_\_
- APP \_\_\_\_\_
- CAF \_\_\_\_\_
- CMU \_\_\_\_\_
- CTR \_\_\_\_\_
- EAG \_\_\_\_\_
- LEG \_\_\_\_\_
- MAS \_\_\_\_\_
- OPC \_\_\_\_\_
- PAI \_\_\_\_\_
- SEC \_\_\_\_\_
- WAW \_\_\_\_\_
- OTH \_\_\_\_\_

RECEIVED & FILED

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FPSC-BUREAU OF RECORDS

DOCUMENT NUMBER-DATE

13312 OCT 29 99

FPSC-RECORDS&REPORTING

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Petition of Competitive Carriers for Commission action to support local competition in BellSouth Telecommunications, Inc.'s service territory.

DOCKET NO. 981834-TP

In re: Petition of ACI Corp. d/b/a Accelerated Connections, Inc. for generic investigation ensure that BellSouth Telecommunications, Inc., Sprint-Florida, Incorporated, and GTE Florida Incorporated comply with obligation to provide alternative local exchange carriers with flexible, timely, and cost-efficient physical collocation.

DOCKET NO. 990321-TP

Filed: October 29, 1999

**MOTION TO ACCEPT TESTIMONY ONE DAY OUT OF TIME**

COMES NOW, Sprint and files this Motion requesting that the Commission accept the Testimony of Michael Hunsucker which has been filed one day out of time. In support, Sprint states as follows:

I. Sprint requests that the Commission accept the testimony of Michael Hunsucker to be filed one day out of time. The Order on Prehearing Procedure required that Direct Testimony be filed with the Commission by Thursday, October 28, 1999. Sprint prepared testimony of two witnesses – Michael Hunsucker and Melissa Cloz. Due to logistical difficulties associated with copying, the required number of filing and service copies of the testimony of Ms. Cloz was unavailable as the filing deadline neared. Counsel decided that a single copy would be filed before the 5 P.M. deadline and the additional copies would be filed the next morning. In the rush to get to the

DOCUMENT NUMBER-DATE

13312 OCT 29 99

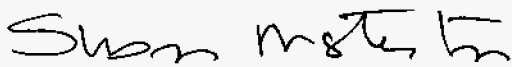
REGISTRATION REPORTING

Commission, the completed (16 copies) filing of the testimony of Mr. Hunsucker was inadvertently left behind.

2. Sprint filed the single original copy of Ms. Cloz's testimony on the 28<sup>th</sup>. The remaining additional copies of that testimony and the original and 15 copies of Mr. Hunsucker's testimony have been filed the morning of the 29<sup>th</sup>. Sprint will hand deliver, on the 29<sup>th</sup>, both copies of the testimony to local service addresses, overnight to out-of-town addresses and e-mail testimony to as many service locations as we can identify. Due to the time frame and need to complete the filing, counsel has not been able to contact other parties regarding concurrence in this Motion. Sprint submits that no party will be materially harmed by the delay in filing since service will be effectuated now as quickly, if not more so, than if done on the 28<sup>th</sup>. Furthermore, the interests of justice will be served if Sprint's testimony is considered in the public interest determinations of this docket.

WHEREFORE, for the above reasons, Sprint request that the Commission accept for filing the testimony of Michael Hunsucker and Melissa Cloz (if filing less than 16 copies is deemed non-compliant with th4e Procedural Order).

RESPECTFULLY SUBMITTED this 29<sup>th</sup> day of October 1999.



Charles J. Rehwinkel  
Susan Masterton  
P.O. Box 2214  
MC FTTLHO0107  
Tallahassee, Florida 3230-2214

ATTORNEYS FOR SPRINT

**CERTIFICATE OF SERVICE**  
**DOCKET NO. 981834-TP & DOCKET NO. 990321-TP**

I HEREBY CERTIFY that a true and correct copy of the Prefiled Direct Testimony of Michael Hunsucker, Melissa Cloz and the Motion To Accept Testimony One Day Out of Time was served by Over-night mail or \*hand-delivery this 29<sup>th</sup> day of October, 1999 to the following:

Nancy B. White \*  
C/o Nancy H. Sims  
BellSouth Telecommunications, Inc.  
150 S. Monroe Street Suite 400  
Tallahassee, Florida 32301-1556  
Convad Communications Company  
Christopher V. Goodpaster  
9600 Great Hills Trail, Suite 150W  
Austin, TX 78759

Rythms Links Inc. \*  
Hopping Law Firm  
Rick Melson  
Post Office Box 6526  
Tallahassee, Florida 32314

Pennington Law Firm \*  
Peter Dunbar/Marc W. Dunbar  
Post Office Box 10095  
Tallahassee, Florida 32302

Florida Cable Telecommunications \*  
Association, Incorporated  
Michael A. Gross  
310 North Monroe Street  
Tallahassee, Florida 32301  
GTE Florida Incorporated \*  
Ms. Beverly Menard  
c/o Margo B. Hammar  
106 East College Avenue, Suite 810  
Tallahassee, Florida 32301

Intermedia Communications  
Scott Sappersteinn  
3625 Queen Palm Drive  
Tampa, Florida 33619-1309

Time Warner Telecom  
Carolyn Marek  
233 Bramerton Court  
Franklin, TN 37069

Blumemfeld & Cohen  
Elise Kiely/Jeffrey Blumemfeld  
1625 Massachusetts Ave NW  
Washington, DC 20036

CompTel  
Terry Monroe  
1900 M Street, NW,  
Suite 800  
Washington, DC 20036

FCCA \*  
c/o McWhirter Law Firm  
Vicki Kaufman  
117 S. Gadsden Street  
Tallahassee, Florida 32301

Intermedia \*  
Wiggins Law Firm  
Charlie Pellegrini/Patrick Wiggins  
Post Office Drawer 1657  
Tallahassee, Florida 32302

WorldCom Technologies, Inc. \*  
& MCI Metro Access Transmission  
Donna McNulty  
325 John Knox Road  
Tallahassee, Florida 32302

Supra Telecommunications &  
Information Systems, Inc.  
Mark Buechele  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, Florida 33133-3001

AT&T Communications of the \*  
Southern States, Inc.  
Ms. Rhonda P. Merritt  
101 North Monroe Street, Suite #700  
Tallahassee, Florida 32301-1549

e.spire Communications, Inc.  
James Falvey  
133 National Business Parkway  
Suite 200  
Annapolis Junction, MD 20701  
Florida Public \*  
Telecommunications Association  
Angela Green, General Counsel  
125 S. Gadsden Street, Suite 200  
Tallahassee, Florida 32301-1525

MediaOne Florida \*  
Telecommunications, Inc.  
c/o Laura L. Gallagher, P.A.  
101 E. College Ave., Suite 302  
Tallahassee, Florida 32301

MGC Communications, Inc.  
Marilyn Ash  
3301 North Buffalo Drive  
Las Vegas, NV 89129

TCG South Florida \*  
c/o Rutledge Law Firm  
Kenneth Hoffman  
Post Office Box 551  
Tallahassee, Florida 32302-0551

Telecommunications Resellers Assoc.

Andrew Isar

3220 Uddenberg Lane, Suite 4

Gig Harbor, WA 98335

A handwritten signature in black ink, appearing to read "Susan S. Masterton", written over a horizontal line.

Susan S. Masterton